



educate inspire challenge

2400 Third Avenue South
Minneapolis, MN 55404
p: 612.874.0500 • f: 612.874.8119
childrenstheatre.org

October 11th, 2017

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel

c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr,
Commissioner Rosenworcel, and Ms. Dortch,

On behalf of The Children's Theatre Company in Minneapolis, MN, I write with concern about the available wireless spectrum and protection for our wireless microphones and backstage communications devices. The Children's Theatre Company performs for 250,000+ audience members of all ages from pre-school to senior citizens each year including 60,000+ students at school matinees and we reach an additional 30,000+ with our touring shows. Every one of our performances uses wireless technology.

We strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

Wireless microphones are essential to producing high-quality performances in our theaters while mitigating significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

At any given moment here at CTC we can be using 32 wireless microphones, 2 in-ear monitors, 12 channels of wireless intercom, hundreds of channels of wireless dimming and computer control of sound, lighting and stage mechanics. At present we employ a full time staff member of IATSE Local 13 who is primarily responsible for wireless communication, especially frequency coordination between all of these devices. He has 15 years of experience in the role and is constantly adjusting the frequencies in use to maintain high quality reception. We own all of this equipment and spent \$40,000 to transition out of the 700MHz band a few short years ago. We now primarily use 470-638MHz for wireless audio. All of our wireless equipment is analog transmission, as digital transmission introduces unwanted latency in the signal path.

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

It is integral to the democratic process that Public Comment is available on this very important issue. The Children's Theater Company should have access to reliable spectrum with interference protection. The arts touch millions of people but we do not have the financial backing of a for-profit corporation. We make major capital investments in our wireless equipment and need assurances that we will continue to be able to use that equipment throughout its useful life.

I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate performing arts organizations and educational institutions that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,



Ellen Baker

Production Manager
Children's Theater Company